

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

U.S. DISTRICT  
COURT OF MAINE  
PORTLAND  
RECEIVED & FILED

**AUG -9 2016**

CHRISTAK. BERRY, CLERK  
BY  
DEPUTY CLERK

UNITED STATES OF AMERICA )

v. )

DONALD CAIN )

Criminal No. **1:16-cr-00103-JAW**  
(18 U.S.C. §§ 875(c), 2261A(2)(B) &  
2261(b)(5))

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**  
**(Stalking)**

Beginning on about November 27, 2014 and continuing until about December 27, 2015, in the District of Maine and elsewhere, the defendant,

**DONALD CAIN**

with the intent to injure, to harass, to intimidate, and to place under surveillance with intent to injure, harass and intimidate, another person, namely, L.H., used facilities of interstate or foreign commerce and electronic communication services, namely telephone calls, text messages and email messages, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to L.H., his then spouse.

Thus, the defendant violated Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(5).

**COUNT TWO**  
**(Transmitting Threatening Communications in Interstate Commerce)**

On about December 13, 2014, in the District of Maine and elsewhere, the defendant,

**DONALD CAIN,**

knowingly and willfully transmitted in interstate commerce a communication containing a threat to injure another. Specifically, Cain placed a telephone call from Texas to Houlton, Maine, and during the call threatened to kill and otherwise harm the mother of the recipient of the call, L.H., stating among other things, "I'm going to get rid of your mother ... if I have to drive fuck'n all the way over there and shoot her in the fuck'n head myself, I'm going to get rid of her."

Thus, the defendant violated Title 18, United States Code, Section 875(c).

**COUNT THREE**

**(Transmitting Threatening Communications in Interstate Commerce)**

On about November 5, 2015, in the District of Maine and elsewhere, the defendant,

**DONALD CAIN,**

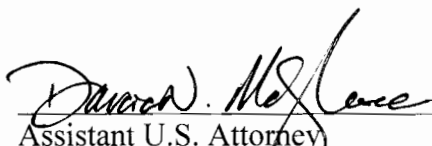
knowingly and willfully transmitted in interstate commerce a communication containing a threat to injure another. Specifically, Cain placed a telephone call from Columbia, South Carolina to Houlton, Maine, and during the call threatened to kill, rape and otherwise harm the recipient of the call, L.H., and members of her immediate family, stating among other things, "You're gonna get raped, fucked, your daughter's gonna get raped, your fucking kids are going to get killed, every fucking body's going to go down, I'm telling you, you fucked up."

Thus, the defendant violated Title 18, United States Code, Section 875(c).

A TRUE BILL,

Signature Redacted. Original on File

FOREPERSON

  
Assistant U.S. Attorney  
Date: 8/9/16